

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF MARYLAND**

DEBORAH LAUFER, Individually,

Plaintiff,

VS.

Case No. 20-cv-01973-SAG

BRE/ESA P PORTFOLIO, LLC, A

Maryland Corporation,

Defendant.

**REQUEST FOR JUDICIAL NOTICE OF DEFENDANT IN SUPPORT OF THE  
MOTION TO DISMISS**

Defendant BRE/ESA P Portfolio, LLC ("**Defendant**") hereby respectfully requests the Court take judicial notice as follows:

1. Attached hereto as **Exhibit 1** is a true and correct copy of results from a nationwide federal court records search using the Courthouse News Service showing **478 cases in which “Deborah Laufer” is listed as the plaintiff**. Pursuant to Federal Rule of Evidence 201, Defendant respectfully requests the Court take judicial notice of this exhibit.

2. Attached hereto as **Exhibit 2** are copies of the following court orders: *Hernandez v. Caesars License Co., LLC*, Case No. 1:19-cv-06087-RMB-KMW (USDC DNJ), Doc # 4; *Hernandez v. Caesars License Co., LLC*, Case No. 1:19-cv-06088-RMB-KMW (USDC DNJ), Doc # 4; *Hernandez v. Montego Bay Resort and Conference Center*, Case No. 1:19-cv-06091-RMB-AMD (USDC DNJ), Doc # 4. Pursuant to Federal Rule of Evidence 201, Defendant respectfully requests the Court take judicial notice of this exhibit.

Dated: August 31, 2020

Respectfully submitted,

/s/ Michelle M. McGeogh

Michelle M. McGeogh

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*Attorney for Defendant BRE/ESA P Portfolio,  
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*Pro Hac Vice Application to be filed*

**CERTIFICATE OF SERVICE**

The undersigned hereby declares that on this 31st day of August, 2020, a true and accurate copy of the foregoing was served via the court's Electronic Case Filing system on all counsel of record.

/s/ Michelle M. McGeogh

Michelle M. McGeogh